

The Boeing Company
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SPECIAL HEARING

2/3/05

cc: BD, DI, DWQ

e-cys: BD, CC, HMS, TH, CMW

February 18, 2005

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Ms. Debbie Irvin
Clerk of the Board
State Water Resources Control Board
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Sacramento, CA 95814

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Dear Board Members:

The Boeing Company appreciates the opportunity to provide written comments to the California Water Resources Control Board concerning the re-issuance of the National Pollutant Discharge Elimination System General Permit for Discharges of Storm Water Associated With Industrial Activities (Industrial General Permit). These written comments are in support and in addition to those provided at the February 3rd presentations by Nancy Sheps, Senior Manager, Safety, Health and Environmental Affairs for our Long Beach C-17 facility.

The Boeing Company has an extensive presence in California. Boeing has 14 major manufacturing or engineering facilities employing approximately 34800 personnel. This makes Boeing one of the largest private manufacturing employers in California. Boeing also has 8718 California suppliers/ vendors with an estimated business to business commerce of 6.38 billion dollars in 2004.

Nationally, the Boeing Company has facilities in nearly every state. This broad exposure has resulted in a wealth of experience in addressing storm water as both policy issues and technical implementation challenges. We have a national working group of professional engineers who exchange information on a monthly basis dealing with these type of issues. During the testimony before the board we heard issues that have been challenges in other states. In the following attachments Boeing will offer suggestions on solutions that have been found viable in these other states and the Federal multi-sector general permit. These attachments will address:

1. Water Quality Standards: A conflict does not exist between the Clean Water Act requirement to meet water quality standards and the nationally accepted use of Best Management Practices as a means to control stormwater. Numeric standards are not required as the CWA allows, and the

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